

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|  |   |
|--|---|
| BRICKMAN INVESTMENTS INC., on<br>behalf of itself and all others similarly situate,<br><br>Plaintiff,<br><br>v.<br><br>ALLOT COMMUNICATIONS LTD.,<br>YIGAL JACOBY, RAMI HADAR and ADI<br>SAPIR,<br><br>Defendants. | No. 1:07-cv-03455-RJH<br><br>[PROPOSED] ORDER GRANTING<br>MOTION OF DIKLA MONDIAL MUTUAL<br>FUND FOR CONSOLIDATION OF<br>RELATED ACTIONS, APPOINTMENT AS<br>LEAD PLAINTIFF AND APPROVAL OF<br>LEAD PLAINTIFF'S SELECTION OF CO-<br>LEAD COUNSEL |
| GERALD BILGER, individually and on<br>behalf of all others similarly situated,<br><br>Plaintiff,<br><br>v.<br><br>ALLOT COMMUNICATIONS LTD.,<br>YIGAL JACOBY, RAMI HADAR and ADI<br>SAPIR,<br><br>Defendants.      | No. 1:07-cv-03815-RJH   |
| ELIYAHU MOKHTAR, individually and on<br>behalf of all others similarly situated,<br><br>Plaintiff,<br><br>v.<br><br>ALLOT COMMUNICATIONS LTD.,<br>YIGAL JACOBY, RAMI HADAR and ADI<br>SAPIR,<br><br>Defendants.    | No. 1:07-cv-05456-RJH   |

*[Captions Continue on Following Page]*

SHANNON VINSON, individually and on behalf of all others similarly situated,

Plaintiff,

v.

ALLOT COMMUNICATIONS LTD.,  
YIGAL JACOBY, RAMI HADAR and ADI SAPIR,

Defendants.

**[PROPOSED] ORDER**

Having considered the motion of Dikla Mondial Mutual Fund for consolidation of related actions, for appointment as Lead Plaintiff and for approval of Lead Plaintiff's selection of Co-Lead Counsel, the memorandum of law in support thereof, the declaration of Dale MacDiarmid in support of that motion and good cause appearing therefor,

**IT IS HEREBY ORDERED:**

- 1) The Motion is granted.
- 2) This Order (the "Order") shall apply to the above-captioned actions (the "Action") and to each case that relates to the same subject matter that is subsequently filed in this Court or is transferred to this Court and consolidated with the Action (collectively, the "Consolidated Action").
- 3) An original of this Order shall be filed by the Clerk in the Master File.
- 4) The Clerk shall mail a copy of this Order to counsel of record in the Consolidated Action.
- 5) Every pleading in the Consolidated Action shall have the following caption:

IN RE ALLOT COMMUNICATIONS LTD.  
SECURITIES LITIGATION

No. 1:07-cv-03455-RJH

6) Each new case that arises out of the subject matter of the Consolidated Action which is filed in this Court or transferred to this Court, shall be consolidated with the Consolidated Action and this Order shall apply thereto, unless a party objects to consolidation, as provided for herein, or any provision of this Order, within ten (10) days after the date upon which a copy of this Order is served on counsel for such party, by filing an application for relief and this Court deems it appropriate to grant such application. Nothing in the foregoing shall be construed as a waiver of Defendants' right to object to consolidation of any subsequently filed or transferred related action.

7) The Court requests the assistance of counsel in calling attention to the Clerk of this Court the filing or transfer of any case that might properly be consolidated as part of the Consolidated Action.

8) When a case that arises out of the same subject matter as the Consolidated Action is hereinafter filed in this Court or transferred from another Court, the Clerk of this Court shall:

- a) file a copy of this Order in the separate file for such action;
- b) mail a copy of this Order to the attorneys for the plaintiff(s) in the newly filed or transferred case and to any new defendant(s) in the newly filed case; and
- c) make the appropriate entry in the Master Docket for the Consolidated Action.

9) Movant Dikla Mondial Mutual Fund is appointed to serve as Lead Plaintiff in the above-captioned Consolidated Action, pursuant to 15 U.S.C. §77z-1(a)(3)(B).

10) The law firms Glancy Binkow & Goldberg LLP and The Law Office of Jacob Sabo are hereby approved as Co-Lead Counsel for the Class. Lead Counsel shall provide general supervision of the activities of plaintiff's counsel and shall have the following responsibilities and duties to perform or delegate as appropriate:

- a) to brief and argue motions;
- b) to initiate and conduct discovery, including, without limitation, coordination of discovery with defendants' counsel, preparation of written interrogatories, requests for admission and requests for production of documents;

- c) to direct and coordinate the examination of witnesses in depositions;
  - d) to act as spokesperson at pretrial conferences;
  - e) to call and chair meetings of plaintiff's counsel as appropriate or necessary from time to time;
  - f) to initiate and conduct any settlement negotiations with counsel for defendants;
  - g) to provide general coordination of the activities of plaintiff's counsel and to delegate work responsibilities to selected counsel as may be required in such a manner as to lead to the orderly and efficient prosecution of this litigation and to avoid duplication or unproductive effort;
  - h) to consult and employ experts;
  - i) to receive and review periodic time reports of all attorneys on behalf of plaintiffs, to determine if the time is being spent appropriately and for the benefit of plaintiffs and to determine and distribute plaintiffs' attorneys' fees; and
  - j) to perform such other duties as may be expressly authorized by further order of this Court.
- i) The law firm of Murray, Frank & Sailer LLP is hereby approved as Liaison Counsel for the Class.

Dated: \_\_\_\_\_, 2007

---

U.S.D.J.

Submitted by:

Brian P. Murray  
**MURRAY, FRANK & SAILER LLP**  
275 Madison Avenue, Suite 801  
New York, New York 10016  
Telephone: (212) 682-1818  
Facsimile: (212) 682-1892

*Proposed Liaison Counsel*

**GLANCY BINKOW & GOLDBERG LLP**  
Lionel Z. Glancy  
Michael Goldberg  
1801 Avenue of the Stars, Suite 311  
Los Angeles, CA 90067  
Telephone: (310) 201-9150  
Facsimile: (310) 201-9160

**THE LAW OFFICE OF JACOB SABO**  
Jacob Sabo  
The Tower No.3 Daniel Frisch St. 15<sup>th</sup> Floor  
Tel Aviv, Israel 64731  
Telephone: 011 972 3 607 88 88  
Facsimile: 011 972 3 607 88 89

*Attorneys for Movant and  
Proposed Co-Lead Counsel*